

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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FRANK L. JUDE, JR.,

Plaintiff,

STATE OF WISCONSIN DEPARTMENT OF  
JUSTICE, OFFICE OF CRIME VICTIM  
COMPENSATION SERVICES and STATE OF  
WISCONSIN, DEPARTMENT OF HEALTH AND  
FAMILY SERVICES,

Case No. 06-C-1101

Involuntary Plaintiffs,

v.

CITY OF MILWAUKEE, et al.,

Defendants

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**PLAINTIFF, FRANK L. JUDE, JR.'S, NOTICE OF MOTION AND MOTION TO HOLD  
COUNSEL FOR DEFENDANT, JON BARTLETT, IN CONTEMPT OF COURT FOR  
FAILURE TO COMPLY WITH THIS COURT'S AUGUST 19, 2009 ORDER, AND FOR  
AN AWARD OF THE REASONABLE ATTORNEYS' FEES INCURRED BY MR. JUDE  
IN BRINGING HIS MOTION TO COMPEL MR. BARTLETT'S DISCOVERY  
RESPONSES**

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**TO: All Counsel of Record and All Unrepresented Parties**

**PLEASE TAKE NOTICE** that the above-named Plaintiff, Frank L. Jude, Jr., by his attorneys, Samster, Konkel & Safran, S.C., will move that branch of the United States District Court for the Eastern District of Wisconsin, presided over by the Honorable Lynn S. Adelman, to hold counsel for Defendant, Jon Bartlett, Bridget E. Boyle, in contempt of Court for failure to comply with this Court's August 19, 2009 Order, and for an award of the reasonable attorneys' fees incurred by Mr. Jude in bringing his Motion to Compel Mr. Bartlett's discovery responses.

This motion is brought pursuant to this Court's August 19, 2009 Order, and for the reasons more fully set forth in the supporting affidavit, attached hereto and filed in support of this motion.

/s/ Jonathan S. Safran  
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Date: February 5, 2010